

STATE OF SOUTH CAROLINA ) IN THE COURT OF COMMON PLEAS  
COUNTY OF CHARLESTON )

Mary Eady as Personal Representative of the ) C/A No. 2018-CP-10-379  
Estate of Ann Oliver, )

Plaintiff(s), ) **CERTIFICATE OF SERVICE**

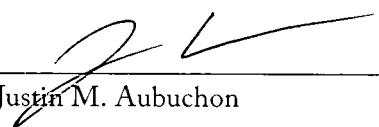
Versus )

CVS Pharmacy, Inc. d/b/a Omnicare Pharmacy )  
Services, South Carolina CVS Pharmacy, LLC )  
d/b/a Omnicare Pharmacy Services, and NCS )  
Healthcare of South Carolina, Inc. d/b/a Omnicare )  
of Charleston, )

Defendants. )

FILED  
2018 MAR -2 PM 2:50  
JULIE J. ARMSTRONG  
CLERK OF COURT

I, Justin M. Aubuchon, hereby certify that South Carolina CVS Pharmacy was served on 2/12/18 through its registered agent with a copy of the Filed Summons & Complaint in regards to the above captioned matter by certified mail as shown by the Domestic Return Receipt attached.

  
Justin M. Aubuchon

3/1, 2018  
Mt. Pleasant, South Carolina

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature  <b>X Pam Johnson</b> <input type="checkbox"/> Agent <input type="checkbox"/> Address</p>	
<p>1. Article Addressed to:</p> <p>CT Corporation System  2 Office Park Court, Suite 103  Columbia, SC 29223</p>		<p>B. Received by (Printed Name) <b>Pam Johnson</b> C. Date of Delivery <b>2-12-18</b></p>	
<p>2. Article Number (Transfer from service label)  <b>7017 3380 0000 8035 3747</b></p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes  If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®  <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™  <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery  <input type="checkbox"/> Certified Mail Restricted Delivery <input checked="" type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation  <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>		<p>Domestic Return Receipt</p>	



9590 9402 3443 7275 8882 96

STATE OF SOUTH CAROLINA ) IN THE COURT OF COMMON PLEAS  
COUNTY OF CHARLESTON )

Mary Eady as Personal Representative of the ) C/A No. 2018-CP-10-379  
Estate of Ann Oliver, )

Plaintiff(s), ) **CERTIFICATE OF SERVICE**

Versus )

CVS Pharmacy, Inc. d/b/a Omnicare Pharmacy )  
Services, South Carolina CVS Pharmacy, LLC )  
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Healthcare of South Carolina, Inc. d/b/a Omnicare )  
of Charleston, )

Defendants. )

2018 MAR -2 PM 2:50  
JULIE J. ARMSTRONG  
CLERK OF COURT

I, Justin M. Aubuchon, hereby certify that CVS Pharmacy, Inc. d/b/a Omnicare Pharmacy Services was served on 2/12/18 through its registered agent with a copy of the Filed Summons & Complaint in regards to the above captioned matter by certified mail as shown by the Domestic Return Receipt attached.

  
Justin M. Aubuchon

3/1, 2018  
Mt. Pleasant, South Carolina

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY:	
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>		<p>A. Signature  <input checked="" type="checkbox"/> Pam Johnson <input type="checkbox"/> Agent <input type="checkbox"/> Address</p>	
<p>1. Article Addressed to:  CT Corporation System  2. Office Park Court, Suite 103  Columbia, SC 29223</p>		<p>B. Received by (Printed Name)  Pam Johnson</p>	<p>C. Date of Delivery  2-12-18</p>
<p>2. Article Number (Transfer from service label)  7017 3380 0000 8035 3730</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes  If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>3. Service Type  <input type="checkbox"/> Adult Signature  <input type="checkbox"/> Adult Signature Restricted Delivery  <input checked="" type="checkbox"/> Certified Mail®  <input type="checkbox"/> Certified Mail Restricted Delivery  <input type="checkbox"/> Collect on Delivery  <input type="checkbox"/> Collect on Delivery Restricted Delivery  <input type="checkbox"/> Insured Mail  <input type="checkbox"/> Mail Restricted Delivery</p>		<p><input type="checkbox"/> Priority Mail Express®  <input type="checkbox"/> Registered Mail™  <input type="checkbox"/> Registered Mail Restricted Delivery  <input checked="" type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Signature Confirmation  <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	

9590 9402 3443 7275 8883 02

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt



## Hughey Injury Lawyers

1311 Chuck Dawley Blvd. Ste. 201  
Post Office Box 348  
Mt. Pleasant, SC 29464  
P: 843-881-8644  
F: 1-888-884-8311

Reply to: Justin Aubuchon  
justin@hugheylawfirm.com

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3/1/18

Honorable Julie J. Armstrong  
Charleston County Clerk of Court  
100 Broad Street, Suite 106  
Charleston, SC 29401

Case No.: 2018-CP-10-379

Dear Ms. Armstrong:

Enclosed please find for filing two (2) Certificate of Service of service in regards to the above referenced matter along with appropriate copies. If you could be so kind as to file the originals and return a filed stamped copy back to me in the self-addressed stamped envelope it would be greatly appreciated. If you have any questions or concerns, do not hesitate to contact me.

If you have any questions, please let me know.

With kind regards,

Yours truly,

*Justin Aubuchon*

Justin Aubuchon  
Litigation Manager

JMA  
Enclosures

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTONMary Eady as Personal Representative of the Estate of Ann Oliver,

Plaintiff(s)

vs.

CVS Pharmacy, Inc. d/b/a Omnicare Pharmacy Services, South Carolina CVS Pharmacy, LLC d/b/a Omnicare Pharmacy Services, and NCS Healthcare of South Carolina, Inc. d/b/a Omnicare of Charleston,

Defendant(s)

Submitted By: D. Nathan HugheyAddress: PO Box 348, Mt. Pleasant, SC 29464

IN THE COURT OF COMMON PLEAS

CIVIL ACTION COVERSHEET

2018-CP-10-379

FILED  
2018 JAN 26 PM 2:19  
JULIE J. HARRIS  
CLERK OF COURTSC Bar #: 68409Telephone #: 843-881-8644Fax #: 1-888-884-8311

Other:

E-mail: nate@hugheyfirm.com

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint.

## DOCKETING INFORMATION (Check all that apply)

\*If Action is Judgment/Settlement do not complete

- ☒ JURY TRIAL demanded in complaint. ☐ NON-JURY TRIAL demanded in complaint.  
☐ This case is subject to ARBITRATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.  
☒ This case is subject to MEDIATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.  
☐ This case is exempt from ADR. (Proof of ADR/Exemption Attached)

## NATURE OF ACTION (Check One Box Below)

- |   |  |   |  |
|---|--|---|--|
| <b>Contracts</b><br><input type="checkbox"/> Constructions (100)<br><input type="checkbox"/> Debt Collection (110)<br><input type="checkbox"/> General (130)<br><input type="checkbox"/> Breach of Contract (140)<br><input type="checkbox"/> Fraud/Bad Faith (150)<br><input type="checkbox"/> Failure to Deliver/Warranty (160)<br><input type="checkbox"/> Employment Discrim (170)<br><input type="checkbox"/> Employment (180)<br><input type="checkbox"/> Other (199) _____ | <b>Torts - Professional Malpractice</b><br><input type="checkbox"/> Dental Malpractice (200)<br><input type="checkbox"/> Legal Malpractice (210)<br><input checked="" type="checkbox"/> Medical Malpractice (220)<br>Previous Notice of Intent Case #<br>2017-NI-10-00063<br><input type="checkbox"/> Notice/ File Med Mal (230)<br><input type="checkbox"/> Other (299) _____                             | <b>Torts - Personal Injury</b><br><input type="checkbox"/> Conversion (310)<br><input type="checkbox"/> Motor Vehicle Accident (320)<br><input type="checkbox"/> Premises Liability (330)<br><input type="checkbox"/> Products Liability (340)<br><input type="checkbox"/> Personal Injury (350)<br><input type="checkbox"/> Wrongful Death (360)<br><input type="checkbox"/> Assault/Battery (370)<br><input type="checkbox"/> Slander/Libel (380)<br><input type="checkbox"/> Other (399) _____   | <b>Real Property</b><br><input type="checkbox"/> Claim & Delivery (400)<br><input type="checkbox"/> Condemnation (410)<br><input type="checkbox"/> Foreclosure (420)<br><input type="checkbox"/> Mechanic's Lien (430)<br><input type="checkbox"/> Partition (440)<br><input type="checkbox"/> Possession (450)<br><input type="checkbox"/> Building Code Violation (460)<br><input type="checkbox"/> Other (499) _____  |
| <b>Inmate Petitions</b><br><input type="checkbox"/> PCR (500)<br><input type="checkbox"/> Mandamus (520)<br><input type="checkbox"/> Habeas Corpus (530)<br><input type="checkbox"/> Other (599) _____  | <b>Administrative Law/Relief</b><br><input type="checkbox"/> Reinstate Drv. License (800)<br><input type="checkbox"/> Judicial Review (810)<br><input type="checkbox"/> Relief (820)<br><input type="checkbox"/> Permanent Injunction (830)<br><input type="checkbox"/> Forfeiture-Petition (840)<br><input type="checkbox"/> Forfeiture—Consent Order (850)<br><input type="checkbox"/> Other (899) _____ | <b>Judgments/Settlements</b><br><input type="checkbox"/> Death Settlement (700)<br><input type="checkbox"/> Foreign Judgment (710)<br><input type="checkbox"/> Magistrate's Judgment (720)<br><input type="checkbox"/> Minor Settlement (730)<br><input type="checkbox"/> Transcript Judgment (740)<br><input type="checkbox"/> Lis Pendens (750)<br><input type="checkbox"/> Transfer of Structured Settlement Payment Rights Application (760)<br><input type="checkbox"/> Confession of Judgment (770)<br><input type="checkbox"/> Petition for Workers Compensation Settlement Approval (780)<br><input type="checkbox"/> Other (799) _____ | <b>Appeals</b><br><input type="checkbox"/> Arbitration (900)<br><input type="checkbox"/> Magistrate-Civil (910)<br><input type="checkbox"/> Magistrate-Criminal (920)<br><input type="checkbox"/> Municipal (930)<br><input type="checkbox"/> Probate Court (940)<br><input type="checkbox"/> SCDOT (950)<br><input type="checkbox"/> Worker's Comp (960)<br><input type="checkbox"/> Zoning Board (970)<br><input type="checkbox"/> Public Service Comm. (990)<br><input type="checkbox"/> Employment Security Comm (991)<br><input type="checkbox"/> Other (999) _____ |
| <b>Special/Complex /Other</b><br><input type="checkbox"/> Environmental (600)<br><input type="checkbox"/> Automobile Arb. (610)<br><input type="checkbox"/> Medical (620)<br><input type="checkbox"/> Other (699) _____<br><input type="checkbox"/> Sexual Predator (510)<br><input type="checkbox"/> Permanent Restraining Order (680)   |  |   |  |
| <input type="checkbox"/> Pharmaceuticals (630)<br><input type="checkbox"/> Unfair Trade Practices (640)<br><input type="checkbox"/> Out-of State Depositions (650)<br><input type="checkbox"/> Motion to Quash Subpoena in an Out-of-County Action (660)<br><input type="checkbox"/> Pre-Suit Discovery (670)   |  |   |  |

  
Date: \_\_\_\_\_

**Submitting Party Signature:**

**Note:** Frivolous civil proceedings may be subject to sanctions pursuant to SCRCP, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10 et. seq.

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF CHARLESTON	)	
	)	
Mary Eady as Personal Representative of the	)	C/A No. 2018-CR-10-379
Estate of Ann Oliver,	)	
	)	
	)	
Plaintiff,	)	SUMMONS
	)	(Jury Trial Demanded)
Versus	)	
	)	
CVS Pharmacy, Inc. d/b/a Omnicare Pharmacy	)	
Services, South Carolina CVS Pharmacy, LLC	)	
d/b/a Omnicare Pharmacy Services, and NCS	)	
Healthcare of South Carolina, Inc. d/b/a Omnicare	)	
of Charleston,	)	
	)	
Defendants.	)	

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, of which a copy is hereby served upon you, and to serve a copy of your Answer to the said Complaint to said Plaintiff's attorneys D. Nathan Hughey, A. Stuart Hudson and Bradley H. Banyas, at their office located at 1311 Chuck Dawley Blvd, Suite 201, Post Office Box 348, Mt. Pleasant, South Carolina 29465-0348, within thirty (30) days after the service hereof; exclusive of the day of such service; and if you fail to do so, judgment by default will be rendered against you for the relief demanded in the Complaint.

FILED  
2018 JAN 26 PM 2:19  
JULIE J. ARMSTRONG  
CLERK OF COURT

HUGHEY LAW FIRM LLC



D. Nathan Hughey (SC Bar No. 68409)  
A. Stuart Hudson (SC Bar No. 71691)  
Bradley H. Banyas (SC Bar 101668)  
1311 Chuck Dawley Blvd., Suite 201  
Post Office Box 348  
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(843) 881-8644  
1-888-884-8311 (F)  
nate@hugheyfirm.com  
stuart@hugheyfirm.com  
brad@hugheyfirm.com

Attorneys for Plaintiff

1/23

\_\_\_\_\_, 2018  
Mt. Pleasant, South Carolina

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF CHARLESTON	)	
Mary Eady as Personal Representative of the	)	C/A No. 2018-CP-10-379
Estate of Ann Oliver,	)	
	)	
Plaintiff,	)	COMPLAINT
	)	(Jury Trial Demanded)
Versus	)	
	)	
CVS Pharmacy, Inc. d/b/a Omnicare Pharmacy	)	
Services, South Carolina CVS Pharmacy, LLC	)	
d/b/a Omnicare Pharmacy Services, and NCS	)	
Healthcare of South Carolina, Inc. d/b/a Omnicare	)	
of Charleston,	)	
	)	
Defendants.	)	

FILED  
2018 JAN 26 PM 2:20  
JULIE J. AMOS  
CLERK OF COURT

The Plaintiff, Mary Eady as Personal Representative of the Estate of Ann Oliver (Plaintiff), complaining of the Defendants, CVS Pharmacy, Inc. d/b/a Omnicare Pharmacy Services, South Carolina CVS Pharmacy, LLC d/b/a Omnicare Pharmacy Services and NCS Healthcare of South Carolina, Inc. d/b/a Omnicare of Charleston ("Defendants"), alleges as follows:

1. The Plaintiff is a citizen and resident of the County of Richland, State of South Carolina.
2. Upon information and belief, Defendant CVS Pharmacy, Inc. d/b/a Omnicare Pharmacy Services, is a corporation organized and existing under the laws of the State of Rhode Island. Defendant CVS Pharmacy, Inc. d/b/a Omnicare Pharmacy Services owns property and transacts significant business in the County of Charleston, State of South Carolina.
3. Upon information and belief, Defendant South Carolina CVS Pharmacy, LLC d/b/a Omnicare Pharmacy Services, is a corporation organized and existing under the laws of the State of South Carolina. Defendant South Carolina CVS Pharmacy, LLC d/b/a Omnicare Pharmacy Services owns property and transacts significant business in the County of Charleston, State of South Carolina.
4. Upon information and belief, Defendant NCS Healthcare of South Carolina, Inc. d/b/a Omnicare of Charleston, is a corporation organized and existing under the laws of the State of Ohio.



Defendant South Carolina NCS Healthcare of South Carolina, Inc. d/b/a Omnicare of Charleston owns property and transacts significant business in the County of Charleston, State of South Carolina.

5. At all times relevant to the matters alleged, the Defendants were acting by and through its actual and apparent agents, servants and employees, including various pharmacists, pharmacy technicians, nurses, administrators, and other hospital staff working at Omnicare, for whose actions and conduct the Defendants are legally responsible.

6. The Defendants have the right or power to direct and control the manner in which its employees provide medical care and operate the business of delivering health care for a fee through the business using the trade name Omnicare. Additionally, the Defendants have a non-delegable duty to provide pharmacists adequately trained and able to provide any necessary and reasonable medical care to patients.

7. This Court has personal and subject matter jurisdiction over this case and venue is proper in this Court.

**FOR A FIRST CAUSE OF ACTION**  
**(Professional Negligence / Negligence Per Se)**

8. The Plaintiff realleges and reiterates all preceding paragraphs, as though fully set forth in their entirety in this paragraph.

9. The Plaintiff's prescription of Lisinopril was discontinued by her physician as a result of acute renal failure brought on by the Lisinopril.

10. Although this prescription was discontinued, the Defendants continued to provide this prescription to the Plaintiff on or about June 9, 2015 through October 2016.

11. As a result of this, the Plaintiff had to be transferred to the hospital due to being in acute renal failure, which was the reason the medication was discontinued originally.

12. The Defendants did undertake the duty to render medical care to the Plaintiff in accordance with the prevailing professional standards of care for pharmacies, pharmacists, pharmacy

technicians, nurses, aides, and medical personnel in the national community.

13. While the Plaintiff was under the care of the Defendants, the Defendants failed to properly verify and confirm her prescriptions and departed from the prevailing professional standards of care and treatment of the Plaintiff and were thereby negligent, careless, grossly negligent, reckless, and negligent per se and acted in violation of the duties owed to the Plaintiff in that they committed one or more of the following acts of omission or commission, any or all of which were departures from the prevailing professional standards of care:

- a. in failing to properly review the Plaintiff's active prescriptions;
- b. in failing to have in place proper and adequate policies, procedures and protocols for management of patients in the Plaintiff's condition, or, if such policies, procedures and protocols were in place, in failing to use due care to enforce them;
- c. in failing to timely administer orders of the attending physicians;
- d. in failing to properly train and educate their pharmacists and pharmacy technicians or, if properly trained and educated, in failing to allow their pharmacists and pharmacy technicians to exercise independent judgment and skill and the failure of said pharmacists, pharmacy technicians and employees to exercise chain of command;
- e. in failing to have appropriate policies, procedures, and protocols to ensure that patients with conditions similar to the Plaintiff are treated in an appropriate manner, or if the Defendants had such policies, procedures, and protocols, in failing to ensure such were carried out and followed;
- f. in failing to ensure that the independent contractor physicians in the pharmacy filled the correct prescriptions for each patient for which the pharmacy is liable as a result of the non-delegable duty of these pharmacists;
- g. in failing to properly diagnose and treat the Plaintiff;
- h. in failing to provide proper, diligent and timely follow-up care;
- i. in failing to properly diagnose and treat the patient;
- j. in failing to transfer care of patient to other, more qualified, medical personnel;
- k. in violating the standard, laws, and regulations of the United States and the State of South Carolina;
- l. and, in such other particulars as may be ascertained through discovery procedures

undertaken pursuant to South Carolina Rules of Civil Procedure.

14. Further, to the extent that the Defendants have violated their own policies and procedures, or any state or federal laws or regulations or other standards, these standards were specifically enacted for the protection of a class of persons which includes The Plaintiff, and the Defendants' failure to comply with the same constitutes a prima facie case of negligence per se.

15. As a direct and proximate result of the negligence, carelessness, gross negligence, recklessness and departure from the professional standards of care by agents and employees of the Defendants, the Plaintiff suffered from pain and suffering, emotional distress, and other injuries and expenditures, as may be shown through discovery or at trial.

**FOR A FIFTH CAUSE OF ACTION**  
**(Negligence - Wrongful Death)**

16. The Plaintiff realleges and reiterates all previous paragraphs as fully as if set forth in this paragraph in its entirety.

17. As a direct and proximate result of the negligence, carelessness, gross negligence, recklessness and departure from the professional standards of care by the Defendants and their agents, servants and/or employees, Ann Oliver suffered from severe debilitating injuries which resulted in her death, as a result of which Ann Oliver's statutory beneficiaries have lost the aid, comfort, support, society and companionship of the decedent, and have suffered severe and extreme emotional distress, anxiety, grief and sorrow, the likes of which no person should endure, for which the Plaintiff is entitled to recover on behalf of statutory beneficiaries, actual and punitive damages pursuant to section 15-51-10, et. seq., Code of Laws of South Carolina (1976, as amended) in an amount to be determined by a jury at the trial of this action.

**FOR A SIXTH CAUSE OF ACTION**  
**(Negligence - Survivorship)**

18. The Plaintiff realleges and reiterates all previous paragraphs as fully as if set forth in this paragraph in its entirety.

19. Ann Oliver's estate, as a direct and proximate result of the negligence, carelessness, gross negligence, and recklessness of the Defendants, has incurred expenses in the form of funeral and burial expenses. The Plaintiff is further informed and does believe that as a direct and proximate result of the negligence, carelessness, gross negligence, and recklessness of the Defendants, as stated, Ann Oliver suffered fear, physical pain, and suffering, medical expense and mental and emotional distress and anguish in the time before her death, for which Ann Oliver's estate is entitled to an award of actual and punitive damages pursuant to section 15-5-90, Code of Laws of South Carolina (1976) in an amount to be determined by a jury at the trial of this action.

WHEREFORE, the Plaintiff, respectfully prays for judgment against the Defendants for actual damages, special damages, consequential damages, and punitive damages in an amount to be determined by the jury at the trial of this action, for the costs and disbursements of this action and for such other and further relief as this court deems just and proper.

HUGHEY LAW FIRM LLC



D. Nathan Hughey (SC Bar #68409)  
 A. Stuart Hudson (SC Bar # 71691)  
 Bradley H. Banyas (SC Bar #101668)  
 1311 Chuck Dawley Blvd., Suite 201  
 Post Office Box 348  
 Mt. Pleasant, SC 29465-0348  
 Telephone: (843) 881-8644  
 Facsimile: (888) 884-8311  
 nate@hugheyfirm.com  
 stuart@hugheyfirm.com  
 brad@hugheyfirm.com

Attorneys for Plaintiff

1/23, 2018  
 Mt. Pleasant, South Carolina



## Hughey Injury Lawyers

1311 Chuck Dawley Blvd. Ste. 201  
Post Office Box 348  
Mt. Pleasant, SC 29464  
P: 843-881-8644  
F: 1-888-884-8311

Reply to: D. Nathan Hughey  
nate@hugheyfirm.com

January 23, 2018

Honorable Julie J. Armstrong  
Charleston County Clerk of Court  
100 Broad Street, Suite 106  
Charleston, SC 29401

Re: Mary Eady as Personal Representative of the Estate of Ann Oliver v. CVS Pharmacy, Inc. d/b/a Omnicare Pharmacy Services, South Carolina CVS Pharmacy, LLC d/b/a Omnicare Pharmacy Services, and NCS Healthcare of South Carolina, Inc., d/b/a Omnicare of Charleston  
Case No.: 2018-CP- -

Dear Mrs. Armstrong:

Enclosed please find for filing a Civil Action Cover Sheet, Summons and Complaint in regards to the above referenced matter along with appropriate copies. I have also enclosed this firm's check in the amount of \$150.00 for the filing fee. If you could be so kind as to file the originals and return a filed stamped copy back to me in the self-addressed stamped envelope it would be greatly appreciated. If you have any questions or concerns, do not hesitate to contact me.

If you have any questions, please let me know.

With kind regards,

Yours truly,

D. Nathan Hughey

DNH/jw  
Enclosures  
CC: Brian E. Johnson, Esquire